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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

NOV 23 1993

In the Matter of)

Policies and Rules)
Implementing the Telephone)
Disclosure and Dispute)
Resolution Act)

CC Docket No. 93-22
RM-7990

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

OPPOSITION

MCI Telecommunications Corporation (MCI) hereby opposes the Petition for Reconsideration filed by US West Communications, Inc. (US West) in the above captioned proceeding. In its Petition, US West asks the Commission to reconsider the November 1, 1993 date by which carriers must comply with Section 64.1510(a)(2)(ii) of the Commission's pay-per-call (PPC) rules, which requires carriers to separate PPC charges from other charges on the bill. In the alternative, US West requests a limited waiver of the rule to extend its effective date in connection with the billing it performs for the American Telephone and Telegraph Company's (AT&T's) 900 service to June 1994.

Events occurring after the filing of US West's request have effectively mooted it. By Order released October 29, 1993,^{1/} the Commission reconsidered the effective date of the "separate billing" requirements in Section 64.1510 and extended the date for compliance by 60 days, from November

^{1/} Policies and Rules Implementing the Telephone Disclosure and Dispute Resolution Act, Order, CC Docket No. 93-22, RM-7990, FCC 93-489, released October 29, 1993.

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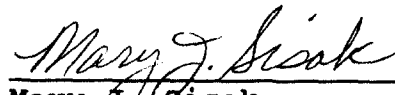
1, 1993 to January 1, 1994. In doing so, the Commission rejected AT&T's request for an eight-month extension based on a determination that there was no convincing evidence that billing system changes necessary to segregate pay-per-call from long distance service charges could not be implemented in a more timely fashion. In addition, the Commission indicated that a lengthier extension would not be in the public interest and would be inconsistent with Congressional intent.

As US West's instant request is substantially similar to AT&T's rejected request, and because reasonable relief from application of the rule has been afforded all parties uniformly, the Commission must deny US West's request.

Respectfully submitted,

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Dated: November 23, 1993

CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that on this 23th day of October, 1993, copies of the foregoing "OPPOSITION" in the Matter of Policies and Rules Implementing the Telephone Disclosure and Dispute Resolution Act in CC Docket No. 93-22, were served by first-class mail, postage prepaid, upon the parties listed on the following attachment.


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